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October 21, 2024

VIA ECF

The Honorable Arun Subramanian United States District Court Southern District of New York 500 Pearl Street, Room 520 New York, NY 10007

RE: United States of America v. Robert Piaro

Case No.: 23 CR 420 (AS)

Dear Judge Subramanian:

Application GRANTED. The hearing will now take place on Thursday, November 14, 2024, at 4:00 PM. The Court wishes Mrs. Piaro a speedy recovery.

The Clerk of Court is directed to terminate the motion at Dkt. 47.

SO ORDERED.

Arun Subramanian, U.S.D.J. Dated: October 21, 2024

The Defendant Robert Piaro ("Mr. Piaro") by undersigned counsel, respectfully submits this letter, with the Government's consent, requesting that the change of plea hearing scheduled for October 23, 2024 at 11:00 A.M. be adjourned for at least one week to a time after October 31, 2024. The reason for this request is because of a medical concern for Mr. Piaro's Wife.

Mr. Piaro's wife underwent surgery on Wednesday, October 16, 2024, and was expected to be released home on Friday, October 18, 2024. Unfortunately, some complications from the surgery have developed and she remains hospitalized. Mr. Piaro is extremely worried about his wife's condition and wants to remain by her side until he knows more about her recovery. Mrs. Piaro's doctors are hopeful that she can be released soon, but it is contingent upon further testing and how Mrs. Piaro responds to treatment. When she is released, she will require ongoing care, and Mr. Piaro will be the one responsible for providing that care, along with home health care providers. Time has already been excluded under the Speedy Trial Act until January 6, 2025.

Respectfully submitted,

/s/ Brian A. Muenchenbach

Bryan K. Penick (Ohio Bar #0071489) Toby K. Henderson (Ohio Bar #0071378) Brian A. Muenchenbach (Ohio Bar #0088722)

(Admitted Pro Hac Vice)

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cc: All counsel of record (via ECF)